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Attorneys for Plaintiff and putative class

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:

DOUBLE JUMP, INC. et al.,¹

Debtor.

JOHN MIRANDA, on behalf of himself and all
others similarly situated

Plaintiff,

v.

DC SOLAR SOLUTIONS, INC., DOUBLE
JUMP, INC., DORA DOG PROPERTIES,
LLC, DOG BLUE PROPERTIES, LLC;
BRANDY BOY PROPERTIES, LLC; 475
CHANNEL ROAD, LLC; PARK ROAD, LLC,
140 MASON CIRCLE, LLC; and DC SOLAR
DISTRIBUTION, INC.

Defendants.

Joint Administration Case No.
BK-19-50102-GS

Chapter 11

**STIPULATION STAYING
ADVERSARY PROCEEDING
WITHOUT PREJUDICE**

Adv. Proc. No. 19-05002-GS

¹ The Debtors in these cases are: DC Solar Solutions, Inc., Double Jump, Inc., Dora Dog Properties, LLC; Dog Blue Properties, LLC; Brandy Boy Properties, LLC; 475 Channel Road, LLC; Park Road, LLC, 140 Mason Circle, LLC, and DC Solar Distribution, Inc.

1 **WHEREAS**, Plaintiff John Miranda, on behalf of himself and all other similarly situated
2 persons, initiated the above-captioned adversary case (the “Adversary Proceeding”) by complaint
3 (the “Complaint”) on February 11, 2019 and filed a First Amended Complaint on February 13,
4 2019 against the Debtors for alleged violation of California Labor Code §§ 1400 – 1408 (the
5 “Cal-WARN Act”).

6 **WHEREAS**, the Debtors filed for Chapter 11 bankruptcy on January 30, 2019
7 (Bankruptcy Case Nos. 19-50103, 19-50104, 19-50105, 19-50106, 19-50108, 19-50109, 19-
8 50130, 19-50131, 19-50135); and

9 **WHEREAS**, the Debtors’ bankruptcy cases are being jointly administered pursuant to an
10 order entered on February 12, 2019 (Order Granting Joint Administration of Case Nos. 19-
11 50103, 19-50104, 19-50105, 19-50106, 19-50108, 19-50109, 19-50130, 19-50131, 19-50135
12 with lead 19-50102) (ECF No. 97); and

13 **WHEREAS**, the Debtors’ Chapter 11 bankruptcy case was converted to Chapter 7 on
14 March 22, 2019 (ECF No. 438); and

15 **WHEREAS**, the Chapter 7 Trustee, Christina W. Lovato, was appointed on March 22,
16 2019) (ECF Nos. 439, 440); and

17 **WHEREAS**, the Trustee, through her undersigned counsel, and counsel for the Plaintiff
18 have discussed the financial condition of the Debtors’ bankruptcy estate and agree that a stay of
19 the Adversary Proceeding for a period of one hundred twenty (120) days, would be appropriate
20 under the circumstances so long as it is without prejudice to either party.

21 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:**

22 1. In order to conserve the resources of the estate and without prejudice to either
23 party, the Adversary Proceeding shall be stayed for a period of approximately 120 days, until
24 October 9, 2019 (the “Stay”).

25 3. The Stay is without prejudice to either party and the parties reserve all rights with
26 respect to any claims or defenses in connection with the Adversary Proceeding.

27 4. Nothing in this Order shall prejudice the rights of any of the parties to seek a
28 further stay beyond the Stay provided for in Paragraph 1 above.

1 DATED this 27th day of June 2019

2
3 By:/s/ James D. Greene

James D. Greene

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